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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
MARY ANN BLIESNER,  
VALLEY PROCESSING, INC.,  
Defendants

Case No. 1:22-CR-2097-SAB

**DEFENDANT'S UNOPPOSED  
MOTION TO CONTINUE  
SENTENCING HEARING AND  
ASSOCIATED FILING  
DEADLINES AND REQUEST  
FOR EXPEDITED  
CONSIDERATION**

Without Oral Argument:  
February 18, 2025, at 6:30 pm

COMES NOW, Defendant Mary Ann Bliesner, by and through her attorneys of record, Carl J. Oreskovich and Andrew M. Wagley of Etter, McMahon, Lamberson, Van Wert & Oreskovich, P.C., and hereby moves this

1 Court for a continuance of the currently scheduled Sentencing Hearing and all  
 2 associated filing deadlines. This Motion is based upon the files and records  
 3 contained in the Court File herein. Defendant further requests this Motion be  
 4 considered on an expedited basis based upon the current sentencing deadlines.  
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 6 Defense Counsel's office has been in contact with Mrs. Bliesner who indicated  
 7 she has no objection to continuing the sentencing hearing. As indicated below,  
 8 this Motion is unopposed by Assistant United States Attorney (AUSA) Dan  
 9 Fruchter, Probation Officer, Jennifer Dykstra, and Co-Defendant Valley  
 10 Processing Inc., by and through its counsel of record.

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**MEMORANDUM OF LAW**  
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13 In general, “[t]he court must impose sentencing without unnecessary  
 14 delay.” Fed. R. Crim. P. 32(b)(1). However, “[t]he court may, for good cause,  
 15 change any time limits” for sentencing. Fed. R. Crim. P. 32(b)(2). For the  
 16 reasons indicated herein, good cause exists to grant this continuance request.

17 In the situation at hand, Mrs. Bliesner respectfully requests a continuance  
 18 of the Sentencing Hearing currently scheduled for March 26, 2025, and all  
 19 associated filing deadlines, (including those related to the Draft Presentence  
 20 Investigation Report), for 30 to 60 days, depending on the Court's availability.

1        This continuance is necessary as additional time is needed to schedule the  
2 Presentence Investigation Interview, gather sentencing materials (including  
3 letters of support), and to prepare for the Sentencing Hearing. The applicable  
4 parties have been delayed based upon the Holidays and various scheduling  
5 conflicts. Furthermore, Defense Counsel is unavailable for the Presentence  
6 Investigation Interview for a majority of this month based upon a preplanned  
7 vacation.  
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10        This is the first request for a continuance of the Sentencing Hearing in this  
11 matter. As indicated above, this Motion is unopposed by all involved parties.  
12 As such good cause exists to grant this continuance.  
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### **CONCLUSION**

15        Based upon the foregoing, Mrs. Bliesner respectfully requests that this  
16 Court grant this Unopposed Motion to Continue the Sentencing Hearing and  
17 Associated Filing Deadlines and reset Mrs. Bliesner's Sentencing Hearing out  
18 30 to 60 days. This request specifically includes the extension of all associated  
19 deadlines, including those related to the Draft Presentence Investigation Report.  
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1 RESPECTFULLY SUBMITTED this 11<sup>th</sup> day of February, 2025.  
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3 ETTER, McMAHON, LAMBERSON,  
4 VAN WERT & ORESKOVICH, P.C.  
5

6 By: /s/ Andrew M. Wagley  
7 Carl J. Oreskovich, WSBA #12779  
8 Andrew M. Wagley, WSBA #50007  
9 *Attorneys for Defendant Mary Ann Bliesner*  
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## **CERTIFICATE OF SERVICE**

I hereby certify that on February 11, 2025, I electronically filed the forgoing document with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to the attorneys of record.

EXECUTED in Spokane, Washington on February 11, 2025.

By: /s/ Jodi Dineen  
Jodi Dineen, Paralegal